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GENERAL COUNSEL

June 27, 2007

**VIA EFILING AND HAND DELIVERY**

Mr. Charles L.A. Terreni  
Chief Clerk/Administrator  
**South Carolina Public Service Commission**  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

Re: Petition of the Office of Regulatory Staff For Commission to Order a Rule To Show Cause As To Why The Certificates Of Public Convenience and Necessity for Certain Providers of Telecommunications Services Should Not Be Revoked  
PSC Docket No.: 2007- \_\_\_\_\_ -C

Dear Mr. Terreni:

Enclosed for filing please find the original and one (1) copy of the Petition of the Office of Regulatory Staff For A Rule To Show Cause As To Why Certificates Of Public Convenience and Necessity Should Not Be Revoked. Please date stamp the one extra copy for our office and return it in the enclosed self-addressed envelope provided.

Note that the attached documents are exact duplicates, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

By copy of this letter, I am serving the necessary parties. Thank you for you assistance and let me know if you have any questions.

Sincerely,

*Shealy Boland Reibold*  
Shealy Boland Reibold

SBR/pjm  
Enclosure

cc: Parties of Record

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**

**DOCKET NO. 2007-\_\_\_\_-C**

**June 27, 2007**

IN RE: Petition of the Office of Regulatory	)	
Staff for Commission to Order a	)	PETITION OF THE OFFICE OF
Rule to Show Cause as to Why	)	REGULATORY STAFF FOR A RULE TO
The Certificates of	)	SHOW CAUSE AS TO WHY
Public Convenience and	)	CERTIFICATES OF PUBLIC
Necessity for Certain Providers of	)	CONVENIENCE AND NECESSITY
Telecommunications Services	)	SHOULD NOT BE REVOKED
Should Not be Revoked	)	

The Office of Regulatory Staff (ORS), by filing this petition, would respectfully show and request of the Commission that:

1. The Public Service Commission of South Carolina ("the Commission") is a state agency constituted pursuant to the laws of the State of South Carolina with its business offices located in Columbia, South Carolina. Further, the Commission is responsible for the regulation of telephone utilities operating for compensation as set forth in S.C. Code Ann. §58-9-10 et seq. (Supp. 2006).

2. The ORS is charged with the duty to protect the public interest pursuant to S.C. Code Ann. §58-4-10, et seq. (Supp. 2006).

3. The Telecommunications Companies listed in Exhibit A are certificated "telephone utilities" as defined in S.C. Code Ann. §58-9-10(6) (1976) in that they are persons or corporations, their lessees, assignees, trustees, receivers or other successors in interest owning or

operating in this State equipment or facilities for the transmission of intelligence by telephone for hire, including all things incident thereto and related to the operation of telephones.

4. The Telecommunications Companies listed in Exhibit A are subject to the jurisdiction of this Commission pursuant to S.C. Code Ann. §58-9-710 et seq. (1976 & Supp. 2006). Further, these Telecommunications Companies have submitted themselves to the jurisdiction of the Commission by their holding a Certificate of Public Convenience and Necessity as indicated in Exhibit A.

5. The Telecommunications Companies listed in Exhibit A, upon receiving their Certificates of Public Convenience and Necessity, were found to possess the technical, financial, and managerial resources sufficient to provide the services requested. S.C. Code Ann. §58-9-280(B)(1) (Supp. 2006).

6. In order to fulfill its responsibilities, ORS may “require the production within this State at such time and place as it may designate of any books, accounts, papers, or records of the telephone utility relating to its business or affairs within the State, pertinent to any lawful inquiry and kept by the telephone utility in any office or place within or without this State . . . so that an examination thereof may be made by the Office of Regulatory Staff or under its direction.” S.C. Code Ann. § 58-9-1070 (Supp. 2006).

7. Despite the repeated and diligent efforts of ORS, the Telecommunications Companies listed in Exhibit A have either failed to answer or have provided insufficient information in response to ORS’ requests for financial and other information.

8. Pursuant to 26 S.C. Code Regs 103-830.B.1, “if a person other than the petitioner is named in a petition for a declaratory order or in a petition for a rule to show cause, the Chief Clerk shall cause a copy of the petition to be mailed to such named person within 14 days of the

filing of the petition.” In order to assist the Commission in serving this Petition on the Respondents, the Office of Regulatory Staff has provided information in Exhibit A as to the status of each Telecommunications Company and whether the entity is a foreign or domestic business entity. S.C. Code Ann §§ 15-9-210, 240, 245 (1976), set forth the procedures for serving foreign and domestic business entities.

9. The information for the business entities listed in Exhibit A accurately reflects the information on file with the South Carolina Secretary of State.

10. “Each telephone utility shall obey and comply with each and every requirement of every order, decision, direction, rule or regulation made or prescribed by the Commission and every direction, rule or regulation made or prescribed by the Office of Regulatory Staff in the performance ... or in relation to any other matter in any way relating to or affecting the business of such telephone utility and shall do everything necessary or proper in order to secure compliance with and observance of every such order, decision, direction, rule or regulation by all of its officers, agents and employees.” S.C. Code Ann. § 58-9-390 (Supp. 2006).

11. Pursuant to S.C. Code Ann. §58-9-1120 (Supp. 2006), “the Commission may ... conduct such other hearings as may be required in the administration of the powers and duties conferred by Articles 1 through 13 of this chapter and by other laws relating to telephone utilities.”

**WHEREFORE**, the ORS staff prays that the Honorable Commission:

1. Enter an order establishing a Rule to Show Cause instituting a formal proceeding against the persons and business entities listed in Exhibit A.

2. For the persons and business entities listed in Exhibit A, pursuant to 26 S.C. Code Regs. 103-830.B.1, cause a copy of this petition to be served upon such named respondents or other proper person or entity within 14 days of the filing of the petition.
3. Require the parties to submit an Answer to this Petition within the deadlines prescribed by the Commission's rules and regulations.
4. Schedule and conduct a formal administrative hearing to address disputed issues of fact and law regarding the Certificate pursuant to S.C. Code Ann. §58-9-820 (Supp. 2006).
5. Find that the Telecommunication Companies listed in Exhibit A have not complied with orders, decisions, directions, rules and regulations made or prescribed by the Commission.
6. Enter a final order canceling the Certificates of Public Convenience and Necessity held by the carriers listed in Exhibit A.
7. For other appropriate action which the Commission may deem necessary.

Shealy Boland Reibold  
Nanette S. Edwards, Esquire  
Shealy Boland Reibold, Esquire  
**Office of Regulatory Staff**  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201  
Phone: 803-737-0877  
Fax: 803-737-0895

June 27, 2007  
Columbia, South Carolina

EXHIBIT A

2007- -G Out of Compliance							
	OrganizationName	Registered Agent	Secretary of State Status	Foreign or Domestic	Docket #	Order #	Date Certificate Issued
1	dPi Teleconnect, LLC Alicia Hill - Sr. Tax Analyst c/o Thomson RIA/Tax Partners 3100 Cumberland Blvd., Suite 900 Atlanta GA 30339	TCS Corporate Services 2 Office Park Ct. - Suite 103 Columbia SC 29223	Good Standing	Foreign	1998-640-C	1999-228	03/30/99
2	IDT America Corporation James Courter - President 520 Broad Street, 4th Floor Newark NJ 07102	Corporation Service Co. 5000 Thurmond Mall Blvd. Columbia SC 29201	Good Standing	Foreign	1994-398-C	1995-19	01/09/95

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**

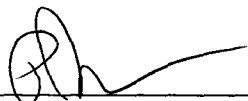
**DOCKET NO. 2007- \_\_\_\_\_ - C**

IN RE: Petition of the Office of Regulatory Staff )	
for Commission to Order a Rule To Show )	
Cause as to Why The Certificates of Public )	
Convenience and Necessity for Certain )	CERTIFICATE OF SERVICE
Providers of Telecommunications Services )	
Should Not be Revoked )	

This is to certify that I, Pamela J. McMullan, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **PETITION OF THE OFFICE OF REGULATORY STAFF FOR A RULE TO SHOW CAUSE AS TO WHY CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY SHOULD NOT BE REVOKED** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

TCS Corporate Services  
2 Office Park Ct., Suite 103  
Columbia, SC 29223  
**RE: dPi Teleconnect, LLC**

Corporation Service Co.  
5000 Thurmond Mall Blvd.  
Columbia, SC 29201  
**RE: IDT America Corporation**

  
\_\_\_\_\_  
Pamela J. McMullan

June 27, 2007  
Columbia, South Carolina